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December

VIA ECF

The Hon. Philip M. Halpern
The Hon. Charles L. Bricant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601

Application granted. The Stipulated Confidentiality Agreement and Protective Order shall be docketed separately.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 56.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
January 3, 2022

Re: *Chaim Tescher v. Experian Information Solutions, Inc., et al.*, 7:21-cv-02266
(S.D.N.Y.) – Letter Motion for Protective Order

Dear Judge Halpern:

I write on behalf of Experian Information Solutions, Inc. (“Experian”) regarding the Court’s form Stipulated Confidentiality Agreement and Protective Order that the parties may submit to the Court for signature “[f]or all cases that warrant the entry of a confidentiality order.” Individual Practices in Civil Cases ¶ 1.I. Experian attaches the executed form order and requests that the Court also afford confidential status to “trade secret or other confidential research, development, or commercial information” pursuant to Federal Rule of Civil Procedure 26(c)(1)(G).

Experian makes this request in accordance with paragraph 2 of the Court’s form order. Paragraph 2 identifies the categories of information that a party may designate as confidential. Following the four categories of information listed in paragraphs 2(a) through 2(d), paragraph 2(e) provides that a party may designate as confidential “any other category of information this Court subsequently affords confidential status.” Experian requests the Court afford confidential status to the additional category to allow the parties to produce nonpublic and competitively sensitive commercial information typically produced and designated as confidential in lawsuits alleging violations of the Fair Credit Reporting Act, while ensuring the information produced is not used for any improper purpose.

Plaintiff Chaim Tescher and defendants Credit Plus, Inc., LoanDepot.com, LLC, and PHH Mortgage Corporation consent to this request.

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Respectfully submitted,

/s/ Rachel C. Karpoff

Rachel C. Karpoff

Counsel for Experian Information Solutions, Inc.

Enclosure

cc: All counsel of record (via ECF)